

**COMMONWEALTH OF MASSACHUSETTS
DEPARTMENT OF TELECOMMUNICATIONS AND ENERGY**

_____)
Investigation by the Department of Telecommunications)
and Energy on its own motion into the appropriate)
regulatory plan to succeed price cap regulation for Verizon) D.T.E. 01-31
New England, Inc. d/b/a Verizon Massachusetts' retail)
Intrastate telecommunications services in the)
Commonwealth of Massachusetts)
_____)

**PETITION FOR LEAVE TO INTERVENE OF
THE ASSOCIATION OF COMMUNICATIONS ENTERPRISES**

Pursuant to 220 CMR § 1.03(1) of the Rules of Practice and Procedure of the
Department of Telecommunications and Energy ("Department"), **THE**
ASSOCIATION OF COMMUNICATIONS ENTERPRISES (the "Petitioner") by

the undersigned counsel, hereby petitions for leave to intervene as a party in this docket. In support of this petition, the Petitioner states as follows:

1. The Association of Communications Enterprises ("ASCENT"), with a principal place of business at 1401 K Street, NW, Suite 600, Washington DC 20005. ASCENT is a national trade association representing over 700 telecommunications service providers and their suppliers, including nineteen Massachusetts members engaged in providing a variety of value-added interexchange, local wireless, and enhanced telecommunications services. Several ASCENT members are authorized by the Commission to provide interexchange and local telecommunications services within Massachusetts.
2. This proceeding, through its determination of (1) what charges are proper for Verizon to impose for intrastate access; and (2) what regulatory structure should govern the pricing of Verizon's retail services, will have a direct and substantial impact on the business operations of the members of ASCENT. Because the members of Petitioner rely and will be relying on Verizon's facilities to provide service to their own customers, Verizon's retail pricing affects both (a) ASCENT's members' competitive position and (b) Verizon's incentive to offer reasonable terms of the service and access that Verizon provides to CLECs, this proceeding is of importance to the Petitioner and its members.
3. Therefore, the Petitioner's rights will be substantially and specifically affected by the outcome of this proceeding and its interests cannot be adequately represented without the Department granting this petition.
4. Petitioner does not currently plan to submit testimony, but may participate through the filing of comments and briefs.
5. The names and addresses of the individuals to receive documents and communications regarding this proceeding are:

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WHEREFORE, for the foregoing reasons, The Association of Communications Enterprises requests that it be granted leave to intervene as a party in this proceeding.

Respectfully submitted,

**THE ASSOCIATION OF COMMUNICATIONS
ENTERPRISES**

By Its Counsel

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